

KDHE NON-DISCRIMINATION GRIEVANCE PROCEDURE

December 20, 2022


Janet Stanek, Secretary

This document addresses the procedures for the Kansas Department of Health and Environment (“KDHE”) employees to respond to external complaints of unlawful or prohibited discrimination by a representative of KDHE.

GENERAL PROVISIONS

KDHE prohibits harassment and intimidation of, and discrimination and retaliation against any individual by a KDHE employee or one of its representatives because of that individual’s race, color, religion, sex (including sexual orientation and gender identity), national origin, age, disability, veteran’s status, ancestry, or socioeconomic status.

All external complaints¹ of discrimination, harassment, retaliation, and intimidation must be forwarded immediately to:

Jade Ramsdell, Coordinator
1000 SW Jackson, Suite 540
Topeka, Kansas 66612
785-296-5156
KDHE.nondiscrimination@ks.gov

This procedure is not intended to establish a legal cause of action; rather, it provides members of the public the opportunity to file a complaint with KDHE if such individuals believe they have been subjected to unlawful or prohibited discrimination, harassment, retaliation, or intimidation by a representative of KDHE. Such investigations are undertaken and completed in contemplation of possible disciplinary action and, in some cases, litigation. As a result, the investigative report and all associated materials are generally considered closed records and may

¹ Employees receiving internal complaints of discrimination are similarly required to report them. Policy and procedures for internal complaints are covered under KDHE Policy 2200.0.

be subject to applicable legal privileges pursuant to the Kansas Open Records Act and other legal authorities.

Complaint of Unlawful Discrimination Defined

For purposes of this policy, a “complaint of unlawful or prohibited discrimination, harassment, retaliation, or intimidation” or a “complaint” is defined as a verbal or written allegation that an external individual has been unlawfully or contrary-to-KDHE-policy denied or excluded from participation in KDHE services, or has otherwise been subjected to disparate treatment in the delivery of services, on the basis of any above-mentioned categories.

KDHE Employee Responsibility for Recording and Reporting Complaints

KDHE employees who receive verbal or written complaints from any person, including a fellow employee, a member of the public, or any other person, alleging unlawful or prohibited discrimination, harassment, retaliation or intimidation by a KDHE employee or employees against an external party are responsible for recording the information and providing it to the Coordinator as explained below. Allegations that are not based on unlawful or prohibited actions should be forwarded through supervisory channels to the appropriate division director or designee for review and action. If the employee receiving the allegations is unsure whether the allegations are based on alleged unlawful or prohibited actions, the employee will contact the Coordinator for guidance.

COMPLAINT PROCESSING AND INVESTIGATION PROCEDURE

The Coordinator is responsible for investigating complaints. The Coordinator and/or delegates are committed to completing prompt and fair investigations of complaints received.

Managing a complaint includes the following stages or steps:

- Intake,
- Processing,
- Investigation (Fact-finding, Research, and Analysis),
- Resolution, and
- Monitoring.

I. Intake

Intake format and pathway. Individuals and organizations may submit complaints using a discrimination complaint form, written correspondence or through a conversation. Complaint can be lodged through multiple communications paths:

- Mail, email, or fax

- Hand delivery
- Call or in-person

Threshold evaluation. At intake, the Coordinator and/or delegates should evaluate the following threshold issues:

- **Timeliness.** In order to be timely, the complaint must be filed within 180 days of the alleged discriminatory act. When evaluating timeliness, consider discrimination is often ongoing, discriminatory impacts are not immediately experienced, or a complainant could not reasonably be expected to know the act was discriminatory within the 180-day period. In these instances, the complaint should be filed 180 days after the complainant became aware of the alleged discrimination.
- **Jurisdiction.** Does the subject matter or issues of the alleged discrimination involve a program, service, benefit, or activity, or an administrative act by the Kansas Department of Health and Environment or its employee, subrecipient, or contractor? Does a KDHE bureau have responsibility for the facility, policy, plan, program, service, benefit, activity, event, communications, or contract or agreement, or where the situation, practice, or action implicated in the complaint took place? If the relationship, after further investigation is not readily apparent, the Coordinator and/or delegates will work with the Office of Legal Services to identify an appropriate jurisdiction with which to file a complaint.

Documentation. Make sure to capture and document information. If captured from a conversation, it is recommended staff utilize the complaint form to capture all necessary information and repeat the summary back to the complainant to ensure all information is timely and accurate. Staff should provide any accommodations or meet language access requests as necessary. Any accommodation or language service should be noted in the complaint documentation and adhered to throughout the process. If the complainant needs materials in an accessible format, all materials throughout the complaint process should be provided in that format without the individual having to make multiple requests.

- **Case ID.** Assign a case ID number, and document in internal bureau complaint log. Be sure to document the date the complaint was received (this is important for the complainant's rights and ability to seek action elsewhere).
- **Complaints Received in Person.** If the complaint is received in person by a KDHE employee, the employee, if reasonably possible, should provide a copy of the KDHE Discrimination Complaint Form to the complainant for completion and return to the employee. The employee is responsible for ensuring that the form is completed, either by the complainant or by the employee; and sending a copy of the form to the Coordinator as soon as possible. The Coordinator will follow up with the complainant. If the

complainant needs assistance filling out or communicating a complaint due to disability, language barrier, or for other reasons, the Coordinator will assist the complainant or direct the complainant to the appropriate services.

- Complaints Received in Writing or Verbally. If the complaint is received in writing or verbally, the recipient of the complaint is responsible for completing, to the extent possible, the KDHE Discrimination Complaint Form; and providing a copy of the form and any written information received by the complainant to the Coordinator as soon as possible. The Coordinator will follow up with the complainant.

Completeness evaluation. For a complaint to be “complete” it must include at least the following:

- Date (must be filed within 180 days of the alleged discriminatory act)
- A written explanation of what happened;
- Information necessary to contact the complainant (name, email, phone number, address);
- Identification of the person or group injured by the alleged discrimination;
- Identification of the person or organization alleged to have discriminated;
- The basis for the alleged discrimination, e.g., race, national origin, limited English proficiency, or disability; and
- Sufficient information to understand the facts that led the complainant to believe discrimination occurred and when the discrimination took place (a description of issues of discrimination is included in *Investigation*).

II. Processing

When the complaint is received, the Coordinator and/or delegates will determine if the complaint is complete, if the complaint meets minimum threshold requirements, and if the complaint fits within the scope and applicability of these procedures. Within 15 days, the Coordinator and/or delegates will process and respond to the complainant that the complaint has been accepted for investigation, dismissed/not accepted for investigation because it did not meet the threshold requirements (including the basis of denial and a referral where possible), or with a request for information needed to make a determination. A complaint can also be dismissed by a complainant at any point during the complaint process.

In addition, the Coordinator and/or delegates may further: (a) request additional written documentation, (b) tape the conversation for transcription purposes, (c) determine if a complaint warrants further investigation. The Coordinator will contact other involved parties for their statement(s), and may interview all appropriate witnesses, the individual(s) accused of the alleged act(s), and review documentation provided by all appropriate parties and applicable records.

Scope and Limitations. The Coordinator and/or delegates will prepare a written investigative report if a complaint has been accepted for investigation. The report will contain information relative to witness interviews documentation of the incident conclusions based on the evidence, and a *recommended outcome*. Upon completion of an investigation, the Coordinator will provide the complainant and the Secretary with a written notice that the investigation has been completed. The complainant also will be notified of their right to file a complaint, if applicable, with the appropriate state or federal agency, regardless of the Coordinator’s determination. Copies of the investigation and determination will be provided to the KDHE Office of Legal Services, KDHE Office of the Secretary, and the appropriate division director or designee for review and action, if appropriate.

Some complaints may actually be requests for access or modifications. If so, the Coordinator and/or bureaus (with the support of the Office of Legal Services) may move the complaint into established processes for managing requests with the permission of the complainant or opt to manage the request for access as an informal resolution to the lodged complaint.

Dismissing a Complaint. Unresponsive, can’t locate, or withdrawn. The Coordinator and/or delegates can dismiss complaints at any time in the process if the Complainant does not respond to repeated requests for needed information within a timely manner, if we cannot locate the complainant – especially if there is no/incomplete contact information, or if the complainant decides to withdraw the complaint.

Suspending a Complaint. In certain circumstances, a complaint investigation may need to be suspended because an external agency’s concurrent investigation supersedes KDHE’s own. Notify the complainant and document and log all information (indicate suspended in the complaint status).

Training and Information Dissemination. It is imperative that the complaint process implementation not only identifies key stakeholders and resources, but includes:

- Routine training developed and provided by KDHE leadership
- Documentation of KDHE’s process,
- Development of any agency specific forms, signage, technology, process guidance, etc.
- Regular and established information dissemination to all responsible parties and shareholders

III. Investigation (Fact-finding, Research, and Analysis)

“Investigation” is a spectrum. The investigation can lean towards the quick and informal that involves nothing more than a quick conversation, document review, and immediate

determination of how to resolve the complaint (sometimes occurring in a matter of a few days) Sub-awardees may contact Title VI Coordinator and/or delegates for guidance, advice, or technical assistance throughout the process.

Timeframe. Once a complaint has been accepted for investigation, KDHE has 60 days from the date of the notification that the complaint has been accepted to the complainant to complete the investigation and send the resolution letter to the complainant. If at the end of 60 days, the Coordinator needs more time to investigate, communicate with the complainant/respondent: the need for an extension, where the team is in the process, the anticipated timeframe, referral information for the appropriate federal agency (this is important because federal agencies also have timelines for filing complaints).

Communications. Once the complainant has been notified, The Coordinator and/or delegates will notify staff involved in the complaint (Bureau/Respondent/Secretary). Communication will vary depending on the nature of the complaint. The Coordinator and/or delegates shall stay in contact and provide updates to the complainant, as applicable/appropriate. Doing this can help mitigate increased tension during this process. The Coordinator/and or delegates will work with the complainant and use appropriate communications strategies, making sure to document communications as necessary.

Investigation Plan. The investigation plan is a required plan used as fact finding to identify and define the issues, identify what information you need to collect, and with whom you need to speak. This written investigation plan serves as a reference for information to include in agency memos, correspondence, etc. At a minimum, this investigation plan shall include:

- KDHE's jurisdiction over the matter
- Description of the issues, including identification of the specific action, policy, or practice responsible for the alleged discrimination;
- Applicable legal theories (e.g., intentional discrimination/disparate treatment or disparate impact/effects, noncompliance with regulations/guidelines);
- Data to be gathered during the investigation; and
 - Proposed activity schedule (including anticipated sequence of case activities such as on-site visits and interviews, and timeframes).
 - The case file should contain documentation that supports the decisions made with respect to each of the above planning elements.

IV. Resolution

Resolution Outcomes. There are several approaches to resolving a complaint. Our ultimate responsibility is to ensure nondiscrimination, meaningful engagement, and equitable benefits and service. The opportunity to resolve a complaint as quickly and informally as possible shall be

encouraged throughout the process. Ideally, all involved shall work together through collaborative, consensual dispute resolution/mediation approaches and problem-solving processes. Throughout the process, all involved should be recording any ideas for resolution. Bureaus may informally resolve the matter without completing a full investigation, use a mediator to come to an agreement, and take steps to quickly resolve. Again, investigation is a spectrum and so is the resolution process. The types of outcomes for complaint resolution are:

- Informal Resolution
- Unsubstantiated. With or without actions.
- Substantiated Finding with actions.

Informal Resolution. KDHE may decide on a course of action suitable to the complainant that allows for resolution of the complaint without the need to substantiate (or refute) claims of discrimination or noncompliance. Informal resolution can consist of anything from use of a *neutral third party or mediator* to informally resolving a matter without completing a full investigation. Informally resolving a complaint is a means of resolving cases with basically the same actions you would get after a full investigation, while avoiding the expenditure of staff and time the full investigation requires. This especially applies if the matter can be dealt with immediately.

Requesting Informal Resolution/Mediation. Mediation may be requested by an aggrieved person/complainant for any “complete” complaint (see *Scope and Limitations* for “complete” complaint specifications). The Coordinator and/or delegates will invite the complainant to participate in mediation to resolve the complaint by informal means; the complainant must respond to the Coordinator and/or delegates in writing within 10 calendar days if they choose to participate in mediation. Mediation should be completed within 30 calendar days of receipt of the complaint.

If the complainant selects mediation, it allows disputes to be resolved in a less adversarial manner. With mediation, the Coordinator/and or delegates or agreed upon mediator assists two opposing parties in a dispute reach an agreement to resolve their issues. The mediator does not function as a judge or arbiter, but simply helps the parties resolve the dispute themselves. Upon receiving a request to mediate, the Coordinator shall identify or designate a mediator who must be a neutral and impartial third party. The mediator must be a person acceptable to all parties and who will assist the parties in resolving their disputes. If the complainant chooses to participate in mediation, they must respond in writing within 10 calendar days of the date of the invitation. This written acceptance must be dated and signed by the complainant and must also include the relief sought. KDHE may choose to contract/fund this external mediation support. After mediation is arranged, a written confirmation identifying the date, time and location of the mediation conference shall be sent to both parties. If possible, the mediation process should be completed within 30 calendar days of receipt of the discrimination complaint/however, this

timeline may be extended to support identifying/contracting mediation support and should ideally be resolved within 30 calendar days of this contract date. This will assist in keeping with the 60-calendar-day timeframe of the written Notice of Final Action if the mediation is not successful, however, will not guarantee completion of this timeframe and if mediation is not successful, a new complaint application should be submitted to follow proper timeline/procedures for complaints. If resolution is reached under mediation, the agreement shall be in writing. Copies will be provided to all parties with originals housed with the KDHE Legal Team. If an agreement is reached, and agreement has been breached, the nonbreaching party may file another complaint. If the parties do not reach resolution under mediation, complainants should resubmit their complaint to move forward with the proper timeline/procedure for investigation as outlined within this policy.

KDHE Office of Legal Services complaint resolution review. Before a decision letter is sent to the complainant, the Coordinator and/or delegates will send a simple email with complaint details. This is not for tracking but is a mechanism to get a “second opinion” to ensure every decision is reasonable and in compliance. If the Coordinator and/or delegates have not heard back from the office within five days, they will proceed with sending the letter to the complainant on the sixth day.

Confidentiality. The coordinator and/or delegates are required to keep the following information confidential to the maximum extent possible, consistent with **applicable law** and fair determination of the discrimination complaint consistent with this policy:

- a. The fact that the discrimination complaint has been filed
- b. The identity of the complainant(s)
- c. The identity of individual respondents to the allegations
- d. The identity of any person(s) who furnished information relative to, or acting in, a complaint investigation

Recordkeeping: The coordinator and/or delegates shall maintain a log of complaints filed that alleged discrimination. The log must include:

- a. The name and contact information of the complainant
- b. Date filed
- c. Date of alleged discriminatory acts
- d. Investigator/reviewer
- e. Preliminary review investigated (y/n) and reason
- f. Date of response
- g. Decision

All records regarding discrimination complaints and actions taken on discrimination complaints must be maintained for a period of not less than three years from the final date of resolution of the complaint.

Issues/Subject Matter. While processing complaints, investigators will identify the specific administrative act, policy, practice or service involved in the alleged discrimination, e.g., denial of services, benefits, or access to a program; excluded from participation in a service or activity; harassment by the program's employees; unequal services in a program, disproportionate and adverse impacts of an administrative act, etc. Even if discriminatory intent cannot be ascertained, identifying the practice, procedure, policy, or service that is alleged to have a disparate effect on one or more members of a certain protected class is a required process. In identifying the subject matter, investigative review will include review and determination of allegations of one or more of the following on a covered basis or bases; i.e., race, color, national origin, including limited English proficiency, disability, which may include:

- Any difference in the quality, quantity, or way a service or benefit is provided;
- Segregation in any part of a program or separate treatment in any manner;
- Restriction in the enjoyment of any advantages, privileges, or other benefits that are provided by the program;
- Standards or requirements for participation or entry that tend to exclude (no modification offered);
- Separate treatment in any manner related to receipt of services or benefits;
- Restriction of the membership of advisory or planning councils that are an integral part of a bureau;
- Failure to provide information or services in languages other than English where a significant number or proportion of potential beneficiaries are of limited English-speaking ability;
- Failure to adequately advise person(s) in the eligible population of the existence of services or benefits;
- Use of criteria or methods of administration that would defeat or substantially impair the accomplishment of program objectives or would impact more heavily on members of a protected group.

Theories of Discrimination.

Intentional Discrimination. Determination that similarly situated persons are treated differently (i.e., less favorably) than others because of their actual or perceived race, color, national origin, disability, etc.

Another type of intentional discrimination involves the use of policies or practices that explicitly classify individuals on the basis of their membership in a particular group. Such “classifications” may (but not always) constitute unlawful discrimination if they are based on protected class characteristics. To prove intentional discrimination, the investigator must show that a challenged action was motivated, in part, by an intent to discriminate. This requires a showing that the

“recipient” decisionmaker was not only aware of the complainant’s actual or perceived race, color, national origin, and disability but that the recipient acted, at least in part, because of the complainant’s race, color, national origin, and disability.

The recipient can articulate a nondiscriminatory explanation for the alleged discriminatory action. The team should determine if there is sufficient evidence to establish that the recipient’s stated reason was a pretext for discrimination. In other words, the evidence supports a finding that the reason articulated by the recipient was not the true reason for the challenged action, and that the real reason was discrimination based on race, color, or national origin (there does not need to be evidence of ill will, bad faith, or any evil motive).

Disparate Impact. The second primary theory for discrimination is based on Title VI regulations and is known as the discriminatory “effects” or disparate impact theory. In contrast to disparate treatment, the disparate impact/effects theory does not require proof of discriminatory intent. Rather, disparate impact cases involve claims that a recipient is violating Title VI regulations by using a neutral policy or practice or other administrative act that has the effect of disproportionately excluding or adversely affecting members of a protected group, and the recipient’s policy or practice lacks a substantial legitimate justification.

In a disparate impact case, the focus of the investigation concerns the consequences of the recipient’s practices, rather than the recipient’s intent. The investigation team should first ascertain whether the recipient used a facially neutral practice that had a disproportionate adverse impact on a group protected by Title VI or Title II. The investigation team should then determine whether the recipient can articulate a substantial legitimate justification for the challenged practice.

To prove a substantial legitimate justification, the recipient must show that the challenged policy was necessary to meeting a goal that was legitimate, important, and integral to the recipient’s mission. If the recipient can make such a showing, the inquiry must focus on whether there are any equally effective alternative practices that would result in less adverse impact or whether the justification proffered by the recipient is actually a pretext for discrimination. If a substantial legitimate justification is identified, the third stage of the disparate impact analysis is the complainant’s (or other’s) demonstration of a less discriminatory alternative.

Retaliation. If a complainant alleges retaliation, the investigation should examine whether the agency took action against the complainant after, and because of, some action of the complainant.

Compliance Requirements. During the investigation, it is important to identify the specific regulations and guidelines for each issue in the complaint. For example, an ADA Title II complaint may allege the agency denied access to a facility because of an inaccessible entrance.

Not only does ADA Title II compel accessible participation, it also requires program access (including physical access to spaces) and has established building guidelines. Bureaus should tease out the specific requirements within the Title II and building guidelines, and actively look at what we are doing or not doing to “comply.” This helps provide a threshold to compare against to see if we are or are not out of compliance and may help a bureau develop actions to resolve a complaint.

Overlapping Scope or Issues. The issues raised in complaints and how we resolve them are not always clear. The issues of the complaint may cross over into areas that are related but involve other scopes of work. This is particularly true for disparate treatment complaints. Employee behavior, conduct, and discipline cross over into human resource matters. When this happens, referral will be made to the appropriate office/department (HR/Compensation; DOA).

V. Monitoring

In instances where resolution involves actions of any kind the complaint has been resolved but is not necessarily closed. A complaint is closed when a complaint is unsubstantiated without actions or, in other resolution types, actions have been taken or implemented. As actions are planned, the Coordinator and/or delegates should determine appropriate intervals for status updates both for the log, case file, and the complainant. If actions are immediately taken at the time of resolution, then no update is necessary. If actions take a long time to set into motion, the Coordinator and/or delegates shall consider updating on the process of implementation. The Coordinator and/or delegates must allow the complainant to opt out of a status update. All KDHE employees are required to provide requested information and assistance to the Coordinator during its investigation. If unlawful or prohibited discrimination, harassment, retaliation, or intimidation has occurred, appropriate action will be taken. Employees who are determined to have violated any portion of this policy may be subject to corrective action, up to and including dismissal. Personnel actions will not be disclosed to the complainant.

Federal and state law protects individuals from being retaliated against because of their involvement in an investigative process. All parties were instructed that there can be no retaliation towards any of the participants. If you feel you are being retaliated against for your participation in the complaint or investigation, please notify Please notify the KDHE Nondiscrimination Coordinator immediately at KDHE.nondiscrimination@ks.gov so we may take appropriate action.

POLICY STATEMENT AND POSTING REQUIREMENT

KDHE’s division directors are responsible for enforcing KDHE’s commitment to nondiscrimination by affirming the principles of equal access to KDHE services, programs, and activities. Managers and supervisors are responsible for ensuring the “Nondiscrimination Notice”

is posted in all KDHE offices and in places conspicuous to all individuals participating in KDHE services, programs, and activities.

REFERENCES/RIGHTS

You have the right to file a complaint (at any time) with the Department of Justice or any other federal agency, including if you disagree with the decision of the responsible office or bureau.

For Civil Rights Title VI visit the Department of Justice, Civil Rights Division, Federal Coordination and Compliance Review Section for additional information including federal agency contacts: <https://www.justice.gov/crt/fcs/TitleVI-Overview>.

You may call the Title VI hotline at 1-888-848-5306 for assistance or submit a complaint directly to:

Federal Coordination and Compliance Section - NWB
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530

Appendix A: Key Definitions and Terminology

Americans with Disabilities Act (ADA) - was signed into law on July 26, 1990, the ADA is a wide-ranging civil rights law that prohibits, under certain circumstances, discrimination based on disability. It affords similar protections against discrimination to Americans with disabilities as the Civil Rights Act of 1964, which made discrimination based on race, religion, sex, national origin, and other characteristics illegal.

Class of person - A category of activities, objects, people, or qualities that have, or are considered to have, certain attributes or characteristics in common. An identifiable group of individuals that a regulation or statute deals with or acts upon differently than it does other people.

Complainant - is a party that makes a complaint that he or she or any specific class of persons has been subjected to discrimination or retaliation prohibited by any civil rights authority.

Demonstrate compliance - organization's ability to show adherence to laws, regulations, guidelines

Demonstrable facts - Facts that can be demonstrated

Discrimination - involves any act or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, subrecipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on such characteristics as race, color, sex, national origin, disability or in the case of disability, failing to make a reasonable accommodation.

Dispute resolution - is a term that refers to a number of processes that can be used to resolve a conflict, dispute or claim.

Disability - is a physical or mental impairment that substantially limits one or more major life activities, a record of such an impairment, or being regarded as having such an impairment.

Evidentiary proof - confirmation that the complaint is verified by evidence.

Federal financial assistance - includes (1) grants and loans of Federal funds; (2) the grant or donation of Federal property and interests in property; (3) the detail of Federal personnel; (4) the sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and (5) any Federal agreement, arrangement, or other contract that has as one of its purposes the provision of assistance.

Informal Resolution - to satisfy certain conditions or obligations as a means of avoiding formal investigation. In an informal resolution a determination of discrimination is not required as both parties agree to resolution.

Investigator or Investigation Team - refers to a KDHE Office or contract personnel responsible for conducting complaint investigations. Investigation of complaints may be part of one's primary job duties, or a duty assigned only occasionally.

Limitations - areas not covered by this policy

Limited English proficiency - persons are individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

Lowest level possible - to remediate at the lowest level or simplest path

Major life activity - is an activity that an average person can perform with little or no difficulty.

Multi-lingual - proficient in multiple languages

National origin - where a person was from, or where that person's ancestors were from

Notice of acceptance - a formal indication of a successful application of complaint

Notice of dismissal - a formal indication of a denied application complaint

Outside the jurisdiction - Not the practical authority granted to a legal body to administer justice within a defined field of responsibility

Primary recipient - means any recipient that is authorized or required to extend Federal financial assistance to another recipient for the purpose of carrying out a program.

Race - a group of people sharing the same culture, history, language, etc.; an ethnic group.

Regulations - are issued by government agencies and have the force of law. Regulations provide more detailed interpretation of statutes.

Responsible bureau/office – KDHE Bureau/Agent who provided the event, program, service or policy that the complaint was made against.

Subrecipient - Any contracted or grant organization or business receiving funds from the city to provide a service, program, activity

Substantiated Finding with actions - provide evidence to support or prove the truth of.

Transcribed - put (thoughts, speech, or data) into written or printed form

Unsubstantiated - With or without actions. - not supported or proven by evidence